



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 2, 2007

Gayle Jackson, Treasurer
Ohio Democratic Party
271 E. State St.
Columbus, OH 43215

Response Due Date:
March 5, 2007

Identification Number: C00016899

Reference: October Monthly Report (9/1/06 – 9/30/06)

Dear Ms. Jackson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule A of your Amended 2006 August Monthly (7/1/06 – 7/31/06), received 11/17/06, 2006 September Monthly (8/1/06 – 8/31/06), and 2006 October Monthly (9/1/06 – 9/30/06) Reports combined disclose transfers totaling \$9,728.96 from the ASDC Partnership Program, which is a joint fundraising committee affiliated with your committee. The sum of the entries itemized on the memo Schedule A, however, total only \$1,022.59.

Please be advised that a memo Schedule A must be provided to itemize your committee's share of the gross contributions received through the joint fundraiser. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the calendar year, and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. 11 CFR §102.17(c)(8)(i)(B) Please clarify this discrepancy.

-Schedule B supporting Line 22 of your report discloses a "JF - Transfer of Proceeds" totaling \$14,300 to "Friends of Sherrod Brown"; however, no receipts have been disclosed on Schedule A that correspond to the joint fundraiser "Ohio Victory 2006". As a state party committee and the joint

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fundraising representative for the "Ohio Victory 2006" joint fundraiser, you must distinguish which receipts were collected for the joint fundraiser "Ohio Victory 2006". In addition, a memo schedule should be provided that discloses the total amount of unitemized contributions received during the period for the "Ohio Victory 2006" joint fundraiser. Please amend your report by providing the missing schedules or clarifying which receipts relate to the "Ohio Victory 2006" joint fundraiser.

-Schedule B supporting Line 30(b) of your report discloses a payment(s) for "Convention Program-Exempt-Vol Dist," "Postage-Exempt-Slate Card," "Postage-Exempt-Volunteer Mail," "Printing-Exempt-Volunteer distributed," "Printing-Exempt-Volunteer Mail," "Printing-Slate Card-Exempt," "Printing-Volunteer Handout," "Slate Card-Exempt," "Slate Card-Exempt-Printing" and "Slate Card-Stamps-Volunteer Mail" which is categorized as Federal Election Activity and therefore, may require the disclosure of the candidate(s) this activity should be attributed to. Expenditures and disbursements for public communications that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any candidate for Federal office, meet the definition of Federal Election Activity under 11 CFR §100.24 and should be disclosed on Schedule B for Line 30(b) along with the identity of the candidate(s).

Further, please be advised that public communications that meet the definition of Federal Election Activity and that also contain express advocacy as defined under 11 CFR §100.22, but do not meet the conditions of exempt activity, would constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure and should be properly disclosed on a Schedule B, E or F supporting Lines 23, 24 or 25, as appropriate rather than on Schedule B for Line 30(b). Please clarify if this activity meets the definition of Federal Election Activity or if it contains express advocacy and amend your report to properly disclose this activity, if necessary.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) B of your report to clarify the following description(s): "Voter ID-No Fed Cand," "Salary-No FEA," "Payroll Expense-No FEA," "Payroll Expenses-No FEA" and "Salary-No FEA." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule A supporting Line 12 discloses a transfer(s)-in from the

“Democratic National Committee”, “DSCC”, and “DCCC”. Schedule(s) B supporting Line 30(b) reflects payments for “Convention Program-Exempt-Vol Dist,” “Postage-Exempt-Volunteer Mail,” “Printing-Exempt-Volunteer Mail,” “Printing-Volunteer Handout,” “T-Shirts-Exempt-Volunteer Distributed” and “Volunteer Handout-Exempt”. Please be advised that a state or local party committee may pay for campaign materials (such as bumper stickers, pins and yard signs) that are distributed by volunteers in connection with activity on behalf of the party’s nominees in a general election and voter drive activity on behalf of the party’s Presidential and Vice Presidential nominees. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used, including distribution by direct mail (mailings by a commercial vendor or from commercial lists); all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §§100.87 and 100.147 and to the Campaign Guide for Party Committees.

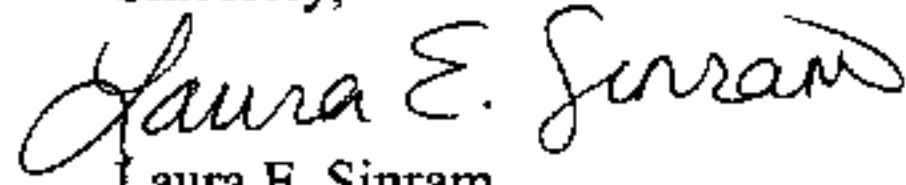
Please clarify the nature of the transfer(s)-in and subsequent payments for the aforementioned disbursement(s). If the activity disclosed on your report does not meet the definition of “exempt” activity as described above, any portion of the expenditures made on behalf of specifically identified candidates must be disclosed on Schedule B, E or F supporting Line 23 or 30(b), 24 or 25 of the Detailed Summary Page as appropriate.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the

Reports Analysis Division) or my local number (202) 694- 1157.

Sincerely,



Laura E. Sinram

Campaign Finance Analyst

Reports Analysis Division

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